



April 25, 2005
AET 05-0027

Mr. Jack R. Strosnider
Director, Office of Nuclear Material Safety and Safeguards
Attention: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

**American Centrifuge Plant
Docket Number 70-7004
Submittal of Reference Documents Related to the Environmental Report (TAC No. L32307)**

Dear Mr. Strosnider:

Pursuant to Reference 1, USEC Inc. (USEC) hereby submits to the U.S. Nuclear Regulatory Commission (NRC) the following reference documents related to the Environmental Report for the American Centrifuge Plant.

Enclosure 1 of this letter provides the U.S. Department of Energy (DOE) letter to USEC dated April 14, 2005 that transmitted the reference documents to USEC. This DOE letter provides clarification regarding DOE's position on one of the documents. Enclosure 2 of this letter provides the following three free release reference documents:

- DOE/EA-1392
- DOE/EA-1346, and
- Phase I Archaeological Survey, dated July 15, 1997.

Enclosure 3 of this letter provides the Phase I Architectural Survey (five volume set) dated December 12, 1997 that contains information identified by the DOE as Official Use Only.

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Jisp Review Completed
LCM

USEC Inc.
6903 Rockledge Drive, Bethesda, MD 20817-1818
Telephone 301-564-3200 Fax 301-564-3201 <http://www.usec.com>

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If there are any questions regarding this matter, please contact, Mr. Peter J. Miner, at (301) 564-3470.

Sincerely,

S. A. Toelle

Steven A. Toelle
Director, Nuclear Regulatory Affairs

cc: M. Blevins, NRC HQ (with enclosures) - 1 copy Fedex to S. Wyngarden.
J. Davis, NRC HQ (w/o enclosures)
Y. Faraz, NRC HQ (w/o enclosures)
B. Smith, NRC HQ (w/o enclosures)

Enclosures: As Stated

Reference:

1. USEC letter (AET 05-0017) from S. Toelle (USEC) to J. Strosnider (NRC), "Additional Responses to the Request for Additional Information for the Environmental Report (TAC No. L32307)," dated April 20, 2005.

Enclosure 1 to AET 05-0027

U.S. Department of Energy (DOE) letter to USEC dated April 14, 2005



Department of Energy

Oak Ridge Operations
P.O. Box 2001
Oak Ridge, Tennessee 37831—

April 14, 2005

Mr. Trent L. Wertz
Centrifuge Program Manager
United States Enrichment Corporation
6903 Rockledge Drive
Bethesda, MD 20817

Dear Mr. Wertz:

NUCLEAR REGULATORY COMMISSION REQUESTED DOCUMENT

Attached per your request are the following reports requested by the Nuclear Regulatory Commission. Some of the documents are stamped "Official Use Only (OUO)" while others are "free release." Therefore, please handle appropriately. Also, note that DOE is not in full agreement with the Phase I Architectural Survey Report.

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| Coleman et al. 1997 | Coleman, K., Dobson-Brown, D., and Herr, D. Phase I Architectural Survey for the Portsmouth Gaseous Diffusion Plant (PORTS Facility) in Scioto and Seal Townships, Pike County, Ohio (submitted to, and copies available from, the U. S. Department of Energy), ASC Group, Columbus, OH, 1997. <i>(DOE doesn't agree with the ASC Group recommendations regarding buildings eligible for inclusion in the National Register of Historic Places. See attached basis for disagreement.)</i> |
| Schweikart et. al. 1997 | Schweikart, J.F., Coleman, K., and Church, F., Phase I Archaeological Survey for the Portsmouth Gaseous Diffusion Plant (PORTS Facility) in Scioto and Seal Townships, Pike County, Ohio (submitted to, and copies available from, the U. S. Department of Energy), ASC Group, Columbus, OH, 1997. |
| DOE 2001a | U. S. Department of Energy, Environmental Assessment: Winterization Activities in Preparation for Cold Standby at the Portsmouth Gaseous Diffusion Plant, Piketon, Ohio, DOE/EA-1392, DOE Oak Ridge Operations Office, Oak Ridge, Tennessee, June 2001. |
| DOE 2001b | U. S. Department of Energy, Environmental Assessment Reindustrialization Program at the Portsmouth Gaseous Diffusion Plant, Piketon, Ohio, DOE/EA-1346, Piketon, OH, May 2001. |

Mr. Trent L. Wertz

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April 14, 2005

We have not been able to locate the following report and are still searching. I will let you know if and when it is located:

Dobson - Dobson-Brown, D., Church, F., and Schweikart, J., Management
Brown Summary for the PORTS Cultural Resource Literature Review, Predictive
et al. 1996 Model, and Preliminary Reconnaissance Survey in Scioto and Seal
Townships, Pike County, Ohio (submitted to Lockheed Martin Energy
System, Inc.), ASC Group, Columbus, OH, 1996.

Please call me at (865) 574-3981, if you have any questions.

Sincerely,



J. T. Howell
Deputy Assistant Manager
for Nuclear Fuel Supply

Attachment

cc w/o attachment:
Larry Clark, NU-50
Marianne Heiskell, NU-51
Terri Slack, CC-10
Bert Gawthorp, PPPO/Lex
Kristi Wiehle, PPPO/PORTS

**Basis for Disagreement with Recommendations of the ASC Group, Inc. Regarding Buildings Eligible for Inclusion in the National Register of Historic Places (NRHP),
Re: Phase I Architectural Survey Report**

PORTS is considered eligible for inclusion in the National Register of Historic Places by the State Historic Preservation Office (SHPO), although contributing and noncontributing resources have not been determined by the office. In January 1994, the SHPO stated that, "the Portsmouth Gaseous Diffusion Plant represents a significant Cold War facility, and as such, it is likely that the facility is an important historic property eligible for inclusion in the National Register of Historic Places under special criteria for properties less than 50 years old." In July 1995, in discussing modifications of a GCEP building, the preservation office additionally stated that "the Portsmouth Gaseous Diffusion Plant is considered eligible for inclusion in the National Register Historic Places because of its exceptional significance in the history of post-world War II United States and, in particular, in our development of nuclear energy potential." Most of the original PORTS facilities are now or are approaching 50 years of age making the special consideration for facilities less than 50 years old unnecessary. As implied by these SHPO opinions, PORTS is eligible under Criterion A, as a district strongly associated with important events in history.

In the Phase I Architectural Survey for the Portsmouth Gaseous Diffusion Plant (PORTS Facility) in Scioto and Seal Townships, Pike County, Ohio, prepared by the ASC Group, Inc., in 1997, recommendations were made regarding what facilities were or were not considered to be contributing to the historical significance of the PORTS site. The ASC Group recommended that all of the facilities associated with the original gaseous diffusion plant (construction dates approximately within the range of 1952-1956) be considered contributing resources. They also recommended that many of the gaseous diffusion facilities constructed after that original development period be considered contributing resources with the exception of environmental monitoring stations, newer warehouses, mobile offices, storage sheds, temporary weatherport warehouses, and other buildings which were not part of the original design. Their reasoning for not including these structures was that they do not add to the understanding of the facility and are not unique in terms of history, architecture or engineering.

They also recommended the facilities associated with the Gas Centrifuge Enrichment Plant (GCEP) constructed in the period between approximately 1979 and 1985 be considered contributing resources reasoning that these structures represent "a significant and major addition to the PORTS facility". They further state that "Although the GCEP facility was uncompleted and an outdated technology, it represents an important part of the history of uranium enrichment facilities in the United States". Their justification for including the GCEP facilities was based strongly on an interpretation of a letter to DOE from the Ohio Historic Preservation Office (OHPO) dated July 17, 1995 (Raymond to Perkins), in which OHPO stated that "The Portsmouth Gaseous Diffusion Plant (PORTS) is considered eligible for inclusion in the National Register of Historic Places because of its exceptional significance in the history of post-World War II United States and in particular in our development of nuclear energy potential." Previous correspondence with OHPO had indicated that it considered PORTS to eligible because it represents a

significant cold war facility. Based on this change in wording by OHPO, the ASC Group felt that OHPO was implying that significant facilities not necessarily associated with the original gaseous diffusion plant should be considered eligible as well, even though they were of relative recent construction.

A more recent letter from OHPO (Snyder to Robinson, October 15, 2002) regarding the proposed modification of GCEP facilities to construct a new centrifuge plant, however, stated that "One of the features giving significance to PORTS is the large scale operation comprising the gaseous diffusion plant. Based on the information provided in the correspondence, it does not appear that the buildings to be modified contain equipment that formed an integral part of the gaseous diffusion operation. It also appears that the buildings to be modified are of somewhat different style, function, and scale than the main buildings that make up the core of the Portsmouth Gaseous Diffusion Plant property." From this statement, it appears that OHPO's primary objective is the protection of the core gaseous diffusion plant building and equipment. As a result, we feel the ASC Group's recommendation that the GCEP facilities be considered contributing resources was inappropriate.